MICHAEL A. CARDOZO

Corporation Counsel of the City of New York

Attorney for Defendant The City of New York

Attn: Hugh H. Shull III 100 Church Street Rm. 5-233 New York, NY 10007 212.788.0457 hshull@law.nyc.gov Hearing date: October 25, 2011 Hearing time: 11:00 a.m.

Objections due: October 18, 2011

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

	Y
In re:	: Chapter 11
OTR MEDIA GROUP INC.,	: Case No. 1-11-47385 (ESS)
Debtor.	: : :
OTR MEDIA GROUP, INC., et al.,	x : : Adv. Pro. No. 1-11-01448
Plaintiffs,	: :
VS.	: NOTICE OF MOTION TO
THE CITY OF NEW YORK,	: VACATE STIPULATION : <u>AND ORDER</u>
Defendant.	: : :

PLEASE TAKE NOTICE that upon the Declaration of Brian T. Horan dated October 11, 2011 and the motion dated October 11, 2011 (the "Motion") of the City of New York, by and through its counsel Michael A. Cardozo, Corporation Counsel of the City of New York, the City will move before the Honorable Elizabeth S. Stong, United States Bankruptcy Judge, at the United States Bankruptcy Court, Eastern District of New York, located at 271 Cadman Plaza East, Brooklyn, New York, on October 25, 2011 at 11:00 a.m. or as soon

thereafter as counsel can be heard, for an order vacating the Stipulation and Order entered

September 2, 2011.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief

sought in the Motion must conform to the Federal Rules of Bankruptcy Procedure and the Local

Rules of the Bankruptcy Court, as modified by any administrative orders entered in this case, and

be filed with the bankruptcy Court electronically in accordance with General Order #462, by

registered users of the bankruptcy Court's case filing system, and by all other parties in interest,

on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, Microsoft

Word, DOS text (ASII), or a scanned image of the filing, with a hard copy delivered directly to

Chambers, and be served in accordance with General Order #462, and served on the New York

City Law Department, 100 Church Street, New York, New York 10007, attention: Brian T.

Horan, Esq., and so as to be received no later than October 18, 2011 at 4:00 p.m. Such papers

shall conform to the Federal Rules of Civil Procedure and identify the party on whose behalf the

papers are submitted, the nature of the response, and the basis for such response.

Dated: October 11, 2011

New York, New York

MICHAEL A. CARDOZO

Corporation Counsel of the City of New York

Attorney for Defendant The City of New York

By:

/s/ Brian T. Horan

Brian T. Horan

Assistant Corporation Counsel New York City Law Department

100 Church Street, Rm. 20-104

New York, New York 10007

212.788.1267

2